

1 ORRICK, HERRINGTON & SUTCLIFFE LLP
2 KAREN G. JOHNSON-MCKEWN (SBN 121570)
3 kjohnson-mckewan@orrick.com
4 ANNETTE L. HURST (SBN 148738)
5 ahurst@orrick.com
6 GABRIEL M. RAMSEY (SBN 209218)
7 gramsey@orrick.com
8 405 Howard Street, San Francisco, CA 94105
9 Tel: 1.415.773.5700 / Fax: 1.415.773.5759
10 PETER A. BICKS (*pro hac vice*)
11 pbicks@orrick.com
12 LISA T. SIMPSON (*pro hac vice*)
13 lsimpson@orrick.com
14 51 West 52nd Street, New York, NY 10019
15 Tel: 1.212.506.5000 / Fax: 1.212.506.5151

16 BOIES, SCHILLER & FLEXNER LLP
17 DAVID BOIES (*pro hac vice*)
18 dboies@bsflp.com
19 333 Main Street, Armonk, NY 10504
20 Tel: 1.914.749.8200 / Fax: 1.914.749.8300
21 STEVEN C. HOLTZMAN (SBN 144177)
22 sholtzman@bsflp.com
23 1999 Harrison St., Ste. 900, Oakland, CA 94612
24 Tel: 1.510.874.1000 / Fax: 1.510.874.1460

25 ORACLE CORPORATION
26 DORIAN DALEY (SBN 129049)
27 dorian.daley@oracle.com
28 DEBORAH K. MILLER (SBN 95527)
29 deborah.miller@oracle.com
30 MATTHEW M. SARBORARIA (SBN 211600)
31 matthew.sarboraria@oracle.com
32 RUCHIKA AGRAWAL (SBN 246058)
33 ruchika.agrawal@oracle.com
34 500 Oracle Parkway,
35 Redwood City, CA 94065
36 Tel: 650.506.5200 / Fax: 650.506.7117

37 *Attorneys for Plaintiff*
38 ORACLE AMERICA, INC.

39 UNITED STATES DISTRICT COURT
40 NORTHERN DISTRICT OF CALIFORNIA
41 SAN FRANCISCO DIVISION

42 ORACLE AMERICA, INC.,
43 Plaintiff,
44 v.
45 GOOGLE INC.,
46 Defendant.

47 Case No. CV 10-03561 WHA
48 **ADMINISTRATIVE MOTION TO FILE
49 UNDER SEAL PORTIONS OF
50 ORACLE'S MOTION IN LIMINE #4 RE:
51 GOOGLE'S DAMAGES EXPERT**
52 Hearing: April 27, 2016, 8:00 a.m.
53 Dept.: Courtroom 8, 19th Floor
54 Judge: Honorable William H. Alsup

1 Plaintiff Oracle America, Inc. (“Oracle”) hereby moves to file portions of its Motion in
 2 Limine #4 Regarding Google’s Damages Expert, Dr. Leonard (“Motion”) under seal pursuant to
 3 Civil Local Rules 7-11 and 79-5.

4 The Order Approving Stipulated Protective Order Subject to Stated Conditions entered in
 5 this case, ECF No. 68, states that when material has been designated as “CONFIDENTIAL” or
 6 “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY,” a party may not file it in the
 7 public record, but must seek to file it under seal pursuant to Civil Local Rule 79-5. Stipulated
 8 Protective Order § 14.4, ECF No. 66.

9 Google Inc. (“Google”) has designated certain deposition testimony, documents, and
 10 financial data discussed in Oracle’s Motion as “CONFIDENTIAL” and “HIGHLY
 11 CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant to the Protective Order. Therefore,
 12 Oracle moves to seal the portions of its Motion that discuss these designated materials pursuant to
 13 the Protective Order.

14 Oracle states no position as to whether disclosure of these materials would cause harm to
 15 Google or any third parties.

16 Dated: March 23, 2016

17 KAREN G. JOHNSON-MCKEwan
 18 ANNETTE L. HURST
 19 GABRIEL M. RAMSEY
 PETER A. BICKS
 LISA T. SIMPSON
 Orrick, Herrington & Sutcliffe LLP

21 By: /s/ Andrew D. Silverman

22
 23 Attorneys for Plaintiff
 24 ORACLE AMERICA, INC.
 25
 26
 27
 28